

**Illinois Commerce Commission  
Pipeline Safety  
Field Trip Report**

|   |                                    |
|---|------------------------------------|
| <b>Operator: AMEREN ILLINOIS COMPANY</b>  | <b>Operator ID#: 32513</b>         |
| <b>Exit Meeting Contact: (Not Applicable)</b>   | <b>Total Man Days: 0</b>           |
| <b>Pipeline Safety Representative(s): Matt Smith</b>  |                                    |
| <b>Company Representative to Receive Report: Michael Fuller</b><br><b>Company Representative's Email Address: mfuller2@ameren.com</b> | <b>Emailed Date:</b><br>12/30/2013 |

**Inspection Summary**

| <b>Inspection Type</b> | <b>Location</b> | <b>ICC Analyst</b> | <b>Inspection Unit(s)</b> | <b>Man Day(s)</b> | <b>Inspection Date(s)</b> | <b>Contact(s)</b> |
|------------------------|-----------------|--------------------|---------------------------|-------------------|---------------------------|-------------------|
| Compliance Follow-Up   | ICC Office      | Matt Smith         | Alton                     | 0                 | 12/27/2013                |                   |

**Statement of Activities**

Staff conducted a review of the proposed change to Ameren's procedure LEAK 2.04 to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590, specifically 192.605. The procedure pertained to checking for more than one below grade leak. The initial NOA was issued when Staff determined Ameren personnel in the Alton operating center failed to discover a second below grade gas leak near to the initial leak that was repaired. Ameren LEAK 2.04 procedure was reviewed, and it was determined the procedure was vague in regard to actions that were required when there was potential for more than one leak below grade.

The proposed change to Ameren LEAK 2.04 does require an employee to check for gas migration after a leak has been repaired. The procedure continues and discusses if "residual" gas is detected, then further rechecks will continue until it is determined a second leak is present or the gas readings diminish. If Ameren persists on using the term "residual," then Staff requests that Ameren either define "residual" in the procedure, or provide further clarification during leak investigation training and Operator Qualification evaluations. The current use of the term "residual" is vague and allows Ameren field personnel a wide latitude in judging if a second leak is present or no other leak is present.

**ISSUE(S) FOUND:**

NO ISSUES FOUND.

**ISSUE(S) CORRECTED:**

NO ISSUES CORRECTED.

**NOTICE OF AMENDMENT(S) FOUND:**

NO NOAs FOUND.

**NOA(S) CORRECTED:**

2013-A001-00128 - Ameren Leak 2.04 procedure stipulates the actions that Ameren personnel must follow when investigating an area where a below grade leak has been repaired. The procedure does include a set of steps that must be followed to determine if there is an additional leak. Staff has requested that Ameren must either better define the term "residual" used in the procedure, or offer guidance on the term through training and/or Operator Qualification evaluations.

**NOTICE OF PROBABLE VIOLATION(S) FOUND:**

NO NOPVs FOUND.

**NOPV(S) CORRECTED:**

NO NOPVs CORRECTED.

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